

## **SUPPLEMENTAL APPEAL BRIEF**

### **(i) REAL PARTY IN INTEREST**

The real party in interest is International Business Machines Corporation, a corporation of New York, with a place of business at Armonk, NY 10504

### **(ii) RELATED APPEALS AND INTERFERENCES**

There are no related appeals or interferences with which the undersigned is aware.

### **(iii) STATUS OF CLAIMS**

Claims 1 - 2, 4, 6 - 9, 13 - 16, and 18 - 19 are pending in the present application. Claims 1 - 2, 4, 6 - 9, 13 - 16, and 18 - 19 have all been finally rejected and are the subject matter of this appeal.

### **(iv) STATUS OF AMENDMENTS**

An amendment to the Final Action of 01/04/2005 was filed 03/07/2005. The Examiner's Advisory Action of 03/21/2005 maintains the final rejection and the amendment is not entered.

**(v) SUMMARY OF CLAIMED SUBJECT MATTER**

Appellants' invention relates to a unique system, method, and computer program product for processing transactions between interconnected processing databases when the processing databases are of a different type. (See Specification page 7, lines 1 - 12, and FIG 1).

Independent claim 1 defines providing a plurality of processing databases of a plurality of types, each having a respective agent. (See Specification page 7, line 1, through page 8, line 9.) Claim 1 also defines providing an intermediary database known as a transaction database. (See Specification page 8, lines 7 - 9, and FIG. 1.) Claim 1 further defines writing a transaction having a key and a detail from a first processing database to the transaction database. (See Specification page 10, lines 5 - 7, and FIG. 2, step 23.) Claim 1 further defines the step of using an agent from a second processing database which is a different type of database than the first processing database, to periodically search the transaction database for a key and a detail to determine whether the agent (from the second processing database) should process a transaction. (See Specification page 10, lines 7 - 15, and FIG. 2, step 24). Claim 1 further defines updating a record in the second processing database using the key and detail. (See Specification page 9, lines 10 - 11).

Appellants' independent claim 8 defines a system for processing transactions. The system comprises a plurality of databases each having a respective agent. (See Specification page 7, line 1, through page 8, line 9.) Claim 8 also has a

transaction database. (See Specification page 8, lines 1 - 3, and FIG. 1, element 12). Claim 8 further defines means for writing a transaction having a key and detail from a processing database to the transaction database. Appellants' Specification page 8, lines 4 - 9, sets forth the structure and acts corresponding to this means for writing claim element. Specifically, the respective agent in each processing database is capable of writing a transaction document over the interconnection to transaction database 12 of FIG. 1.

Claim 8 also defines means for periodically searching, with an agent in a second processing database of a different type, in the transaction database for a key and detail to determine whether the agent should process a transaction. Appellants' Specification page 9, lines 1 - 17, and page 10, lines 7 - 15, sets forth the structure and acts corresponding to this means for periodically searching claim element. Namely, the agent of the second processing database searches the transaction database 12 of FIG. 1 over the interconnection shown in FIG. 1 and page 8, lines 7 - 17, for a key and detail. From the key and detail, the agent determines whether a transaction should be processed. Finally, claim 8 defines means for updating a record in the second processing database using the key and detail. The structure and acts corresponding to this means for updating claim element are set forth in Appellants' Specification page 9, lines 8 - 11. Specifically, the agent in the second processing database replaces data within the document with data from the detail.

Appellants' independent claim 15 defines a computer readable medium having program instruction means for carrying

out the same steps defined in claim 1. Support for each of these steps is given above with regard to claim 1.

**(vi) GROUND OF REJECTION**

There are now three grounds of rejection. In the Final Office Action of 01/04/2005, all of the pending claims, claims 1 - 2, 4, 6 - 9, 11, 13 - 16, and 18 - 19 were rejected under 35 U.S.C. 103(a) as being unpatentable over Draper et al. (US Patent 6,192,365) in view of Chandrasekaran, et al. (US Patent 6,738,971). Claims 3, 5, 10, 12, and 17 were rejected under 35 U.S.C. 103(a) as being unpatentable over Draper, Chandrasekaran, and further in view of Bowen et al. (U.S. Patent 6,094,649). The issue is whether Draper when taken with Chandrasekaran and Bowen disclose all of the features of Appellants' claims 1 - 19.

In the Office Action dated 09/22/2006 the Examiner states new grounds of rejection. Independent claims 1, 8, and 15, along with 2 - 7, 9 - 14, and 16 - 19 dependent therefrom are rejected under 35 U.S.C. 112 first and second paragraphs as failing to comply with the written description requirement and as being indefinite respectively. This is referred to as the second ground of rejection in the argument section (vii) which follows.

In the same Office Action, the Examiner rejects claims 1 - 19 under 35 U.S.C. 103(a) as being unpatentable over Brodersen, U.S. Patent 6,405,220, in view of Raz, U.S. Patent 6,292,827. This is the third ground of rejection. The issue is whether

Brodersen when taken with Raz discloses or suggests all of the features of Appellants' claims 1 - 19.

**(vii) ARGUMENT**

**FIRST GROUND OF REJECTION**

Appellants' independent claims 1, 8, and 15 are finally rejected by the Examiner under 35 U.S.C. 103(a) as being unpatentable over Draper in view of Chandrasekaran. The Examiner's position is that Draper teaches all of the elements of Appellants' claims 1, 8, and 15 except 'databases of a plurality of types' and 'said second of said plurality of databases having a different type than said first of said plurality of databases.' The Examiner then states that Chandrasekaran specifically teaches 'databases of a plurality of types' in his fig. 2, elements 110, 112; and 'said second of said plurality of databases having a different type than said first of said plurality of databases' in column 2, line 10 - 17, column 3, line 65 - 67, column 4, line 1, because one database system may be an IBM DB2 database while another may be an ORACLE database (column 2, line 10 - 17).

Appellants submit that no such databases of a plurality of types nor a second of said plurality of databases having a different type than said first of said plurality of databases are described or suggested by Chandrasekaran.

Chandrasekaran notes in his column 2, lines 14 - 17, that his database system 104 may be an Oracle database server system

while database system 106 may be an IBM database server system such as DB2. However, Appellants' use of the term type of database is clearly defined in their Specification page 7, lines 3 - 9. Appellants furthermore list the types of databases to include a relational database, a messaging database, a sequential database, a spreadsheet database, or a Lotus Notes database. Furthermore, Appellants give on line 5 and 6, as examples of the relational database type a DB2 database or ORACLE database. Thus it is clear that under Appellants' definition of the term type of database, DB2 and ORACLE are both relational type databases. These are not databases having a different type as required by Appellants' independent Claims 1, 8, and 15. Chandrasekaran therefore does not describe or suggest with his example of Oracle and DB2, this important feature of databases having a different type.

Nor does Chandrasekaran describe or suggest in any of the other portions cited by the Examiner (as listed above), the databases of a plurality of types and a second of said plurality of databases having a different type than said first of said plurality of databases as required by Appellants' independent claims 1, 8, and 15.

All of Appellants' other pending claims depend directly or indirectly on these independent claims and therefore also require these features.

Clearly neither Draper nor Chandrasekaran separately describe or suggest Appellants' claimed invention. Furthermore, there is no suggestion in either document on how either can be modified or combined to provide Appellants' claimed invention.

Appellants' position therefore is that rejection of the pending claims is in error and must be withdrawn. All of the claims are allowable under the first ground of rejection.

## **SECOND GROUND OF REJECTION**

Regarding rejection of claims 1, 8, and 15 as failing the written description requirement of 35 U.S.C. 112 first paragraph, the Examiner states first that FIG. 4A - 4B description is not provided to one or more transactions, each having a key and a detail as claimed in claims 1, 8, and 15. Appellants disagree. Support for one or more transactions each having a key and a detail of claims 1, 8, and 15 is found in the Specification page 10 lines 5 - 7. Further description of key and detail is given on page 9 lines 1 - 11. Appellants position is that one of ordinary skill in the relevant art could practice claims 1, 8, and 15 based on such description.

Secondly the Examiner also cites FIG. 3B for not showing element numbers. Appellants disagree with this rejection. The element numbers 31 - 33 of FIG. 3 are already shown in FIG. 3A. One of ordinary skill would immediately recognize from the break lines shown that FIG. 3B is a horizontal continuation of FIG. 3A. The two together form FIG. 3. Element numbers 31 - 33 do not need to be shown in FIG. 3B.

Appellants therefore respectfully request the board to overrule the Examiner's rejections under 35 U.S.C. 112 first paragraph.

Regarding rejection of claims 1, 8, and 15 as indefinite under 35 U.S.C. 112 second paragraph, the Examiner states that it is not clear what is meant by one or more transactions each having a key and a detail. As noted above, the Specification on page 9, starting at line 1, clearly describes what is meant by transactions having a key and a detail. One of ordinary skill in database arts would clearly understand from this description and their background in the art what is meant by transactions having a key and a detail. Claims 1, 8, and 15 are not indefinite. Appellants respectfully request the board to overrule the Examiner's rejection under 35 U.S.C. 112 second paragraph.

### **THIRD GROUND OF REJECTION**

Regarding rejection of claims 1, 8, and 15 under 35 U.S.C. 103(a) as unpatentable over Brodersen in view of Ray, Appellants claim 1 clearly recites a plurality of processing databases of a plurality of types each having a respective agent. Refer to Appellants' FIG. 1 where the processing databases are elements 14 and 16. The Examiner states that Brodersen's FIG. 9 elements 3, 23a, and 305 correspond to Appellants' databases and element 315 corresponds to Appellants' respective agent. Appellants disagree. Brodersen's element 315 is clearly and repeatedly described as a workgroup server in his col. 16, lines 17, 19, 30, 39, 49, 51, 67 and col. 17, lines 9, 18, 20, 31, and 40. Furthermore Brodersen's FIG. 9 shows that element 315 is not a part of databases 3 or 23a, that is, it is not included in database 3 or 23a as described in Appellants' Specification page



8, line 4. Appellants' claim 1 uses the claim term "having" which is understood to mean "included in" or "being a part of". Therefore Brodersen's element 315 of FIG. 9 is clearly not included in databases 3 and 23a. In fact, element 315 is a server, not an agent and database 305 resides on server 315 rather than the other way around. The Examiner has incorrectly identified element 315 as Appellants' agent.

Furthermore, Appellants' claim 1 requires providing a transaction database. One or more transactions, each having a key and a detail are written from one of the processing databases to this transaction database. An agent from a second processing database having a different type, then periodically searches in the transaction database for a key and a detail to determine whether that agent should process the one or more transactions. The Examiner states that Brodersen's transaction log of col. 15 lines 58 - 65 describes Appellants' transaction database and that Brodersen teaches searching the transaction database for a key and a detail in col. 16, lines 21 - 26. Appellants respectfully disagree. There is no description of a key and detail in col. 16, lines 21 -26. Nor have Appellants found anywhere else in Brodersen any description or suggestion of a key and a detail, or searching for a key and detail. The Examiner has incorrectly characterized Brodersen's descriptions.

Finally, Appellants' claim 1 requires updating a record in the second processing database by using the key and detail. The Examiner states that Brodersen teaches this in his col. 16, lines 37 - 40. Appellants disagree. Although Brodersen describes updating transactions into a master database, there is

absolutely no description or suggestion of doing this by using the key and detail as required by Appellants' claim 1.

Claim 1 is clearly allowable under 35 U.S.C. 103(a) over Brodersen for the several reasons given above. Likewise, independent claims 8 and 15 recite similar limitations and are allowable for the same reasons. All of the remaining claims depend directly or indirectly on these allowable claims and are also allowable.

In view of the above, it is respectfully requested that the Board reverse the Examiner's final rejection of all of the claims on appeal and allow these claims.

Respectfully submitted,

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**(viii) CLAIMS APPENDIX**

1. A method of processing transactions, comprising the steps of:

providing a plurality of processing databases of a plurality of types each having a respective agent;

providing a transaction database;

writing one or more transactions, each having a key and a detail, from a first of said plurality of processing databases to said transaction database;

periodically searching, using a processing agent from a second of said plurality of processing databases, said second of said plurality of databases having a different type than said first of said plurality of databases, in said transaction database for a key and detail to determine whether said processing agent should process said one or more transactions; and

updating a record in said second of said plurality of processing databases, by using said key and detail.

2. The method of claim 1, wherein said transaction database is a messaging database.

3. The method of claim 1, wherein said transaction database is a LOTUS NOTES database and said plurality of processing databases are adapted to read said LOTUS NOTES database.

4. The method of claim 1, wherein each of said one or more transactions has a processor designation specifying which of said plurality of processing databases is affected by said each of said one or more transactions.

5. The method of claim 1, wherein said key includes a wildcard character.

6. The method of claim 1, further comprising the step of transferring said one or more transactions from said transaction database to said second of said plurality of processing databases prior to said step of updating a record.

7. The method of claim 1, further comprising the step of setting a status flag in said one or more transactions.

8. A system for processing transactions, comprising:

a plurality of processing databases of a plurality of types each having a respective agent;

a transaction database;

means for writing one or more transactions, each having a key and a detail, from a first of said plurality of processing databases to said transaction database;

means for periodically searching, using a processing agent from a second of said plurality of processing databases, said second of said plurality of databases having a different type than said first of said plurality of databases, in said transaction database for a key and detail to determine whether said processing agent should process said one or more transactions; and

means for updating a record in said second of said plurality of processing databases, by using said key and detail.

9. The system of claim 8, wherein said transaction database is a messaging database.

10. The system of claim 8, wherein said transaction database is a LOTUS NOTES database and said plurality of processing databases are adapted to read said LOTUS NOTES database.

11. The system of claim 8, wherein each of said one or more transactions has a processor designation specifying which of said plurality of processing databases is affected by said each of said one or more transactions.

12. The system of claim 8, wherein said key includes a wildcard character.

13. The system of claim 8, further comprising means for transferring said one or more transactions from said transaction database to said second of said plurality of processing databases.

14. The system of claim 8, wherein said one or more transactions have a status flag.

15. A computer program product for instructing a computer processor to handle transactions, said computer program product comprising:

a computer readable medium;

first program instruction means for providing a plurality of processing databases of a plurality of types each having a respective agent;

second program instruction means for providing a transaction database;

third program instruction means for writing one or more transactions, each having a key and a detail, from a first of said plurality of processing databases to said transaction database;

fourth program instruction means for periodically searching, using a processing agent from a second of said plurality of processing databases, said second of said plurality of databases having a different type than said first of said plurality of databases, in said transaction database for a key and detail to determine whether said processing agent should process said one or more transactions; and

fifth program instruction means for updating a record in said second of said plurality of processing databases, by using said key and detail; and wherein

all said program instruction means are recorded on said medium.

16. The computer program product of claim 15, wherein each of said one or more transactions has a processor designation specifying which of said plurality of processing databases is affected by said each of said one or more transactions.

17. The computer program product of claim 15, wherein said key includes a wildcard character.

18. The computer program product of claim 15, further comprising sixth program instruction means for transferring said one or more transactions from said transaction database to said second of said plurality of processing databases.

19. The computer program method of claim 15, further comprising sixth program instruction means for setting a status flag in said

one or more transactions.

**(ix) EVIDENCE APPENDIX**

None.



**(x) RELATED PROCEEDINGS APPENDIX**

None.